

EXHIBIT A

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Subject: Fractus -- follow-up from conference call regarding claim construction

Counsel,

Thank you for the productive conference call today concerning claim construction. On behalf of all Defendants, we wanted to follow-up with you on a few items.

Expert Declarations: On our conference call, you asked for the authority as to why expert declarations are due on January 11, 2019. The Court's Docket Control Order provides January 11, 2019 as the deadline to "Comply with P.R. 4-3 (Joint Claim Construction Statement)." On October 25, 2018, the Court issued General Order 18-10, which amended Local Rule 4-3. <http://www.txed.uscourts.gov/?q=general-orders> ; <http://www.txed.uscourts.gov/sites/default/files/goFiles/GO-18-10%20General%20Order%20Amending%20Local%20Rules.pdf> . Local Rule 4-3(b) states, "Each party shall also simultaneously serve a disclosure of expert testimony consistent with Fed. R. Civ. P. 26(a)(2)(B(i)-(ii) or 26(a)(2)(C) for any expert on which it intends to rely to support its proposed claim construction or indefiniteness position or to oppose any other party's proposed claim construction or indefiniteness position." The previous rule similarly required parties to exchange a detailed summary of expert opinions at the 4-3 deadline; this rule change only clarifies the amount of detail required.

Further narrowing the disputed terms: We discussed on our conference call that there were certain patent claims that were responsible for an oversized number of disputed claim terms and indefiniteness arguments. These include, for example, claims 3, 5, 6, 9, and 18 of the '814 patent; claim 12 of the '870 patent; claim 12 of the '256 patent; and claim 18 of the '493 patent. We understand that Fractus is currently preparing a global proposal for narrowing the case, but prior to that proposal, please let us know if Fractus will withdraw the aforementioned claims and any other claims in order to streamline the claim-construction process.

Proposed Compromises and Agreements: Based on the party's P.R. 4-2 disclosures and our conference call, Defendants propose the following stand-alone terms as agreed constructions. Please let us know if Fractus agrees.

Claim Term	Claims	Proposal
“simultaneously” “works simultaneously” “provide service simultaneously” “adapted to operate simultaneously” “operative simultaneously” “configured to simultaneously cover” “simultaneously covers”	<u>'191</u> : 1, 12, 14, 15, 19 <u>'918</u> : 1, 9, 38 <u>'768</u> : 1, 2, 9, 16, 23, 30, 38 <u>'870</u> : 1, 5, 11, 14, 20, 23, 29, 33 <u>256</u> : 1, 17	No construction is necessary at this time.
“integer divider”	<u>'870</u> : 1 <u>'768</u> : 9, 14, 21	“a divider that is a whole number, and does not have a fractional or decimal part.”
“integer factor”	<u>'918</u> : 25 <u>'940</u> : 16	“a divider that is a whole number, and does not have a fractional or decimal part.”
“the number of the mono-band arrays corresponds to the number of working frequencies of the multiband antenna array”	<u>'191</u> : 1, 5	“the number of the plurality of <i>mono-band antenna arrays</i> equals the number of working frequencies of the <i>multiband antenna array</i> ”
“the number of the plurality of mono-band antenna arrays corresponds to the number of working frequency bands of the interlaced multiband antenna array”	<u>'918</u> : 1	“the number of the plurality of <i>mono-band antenna arrays</i> equals the number of working <i>frequency bands</i> of the <i>interlaced multiband antenna array</i> ”
“a number of the mono-band antenna arrays corresponds to a number of the plurality of working frequency bands of the interlaced multiband antenna array”	<u>'918</u> : 38	“the number of the <i>mono-band antenna arrays</i> equals the number of the plurality of working <i>frequency bands</i> of the <i>interlaced multiband antenna array</i> ”
“a number of the plurality of mono-band antenna arrays corresponds to a number of the plurality of working frequency bands of the interlaced multiband antenna array”	<u>'768</u> : 1, 9, 16, 23, 30, 38 <u>'870</u> : 1, 11, 20	“the number of the plurality of <i>mono-band antenna arrays</i> equals the number of the plurality of working <i>frequency bands</i> of the <i>interlaced multiband antenna array</i> ”

Claim Term	Claims	Proposal
"a number of the plurality of dual-polarized mono-band antenna arrays corresponds to a number of the plurality of working frequency bands of the interlaced dual-polarized multiband antenna array"	'870: 29	"the number of the plurality of dual-polarized <i>mono-band antenna arrays</i> equals the number of the plurality of working <i>frequency bands</i> of the <i>interlaced dual-polarized multiband antenna array</i> "

We look forward to hearing from you soon.

Thanks,
David

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